1 Daniel A. De Soto (SBN 205861) LAW OFFICE OF DANIEL A. DE SOTO 2 619 South Olive Street, Ste 400 Los Angeles, CA 90014 Telephone: (323) 743-8995 Facsimile: (323) 837-4766 3 desotolegal@gmail.com 4 5 Attorney for Defendant Timothy Glen Curry 6 7 8 UNITED STATES DISTRICT COURT 9 CENTRAL DISTRICT OF CALIFORNIA 10 CHRIS PRINCIPE. Case No: 8:17-cy-00608 11 Plaintiff, **DECLARATION OF JENNIFER** 12 VS. McADAM IN SUPPORT OF **DEFENDANT TIMOTHY GLEN** 13 TIMOTHY GLEN CURRY A/K/A TIMOTHY TAYSHUN, **CURRY'S OPPOSITION TO** 14 PLAINTFF'S MOTION FOR Defendant. PRELIMINARY INJUNCTION 15 DATE: December 1, 2017 16 TIME: 2:30 p.m. 17 CTRM: 10 A 18 Hon. Josephine L. Staton 19 20 21 22 23 24 25 26 27 28 DECLARATION OF JENNIFER MCADAM IN SUPPORT OF DEFENDANT TIMOTHY GLEN

CURRY'S OPPOSITION TO PLAINITFF'S MOTION FOR PRELIMINARY INJUNCTION

DECLARATION OF JENNIFER McADAM

I, Jennifer McAdam, declare:

I live in Scotland, in the United Kingdom, and am over the age of 18. The facts stated in this declaration are within my personal knowledge, except those stated to be on information and belief, and, if called upon, I could and would competently testify to them.

- 1. In April 2016, I joined OneCoin, which I thought at the time was a genuine and authentic cryptocurrency investment opportunity. My personal investment was 10,000 Euros, and collectively over a 1 year period, my team collectively invested 250,00 Euros.
- 2. I invested in OneCoin because what was presented to me was utterly believable to anyone who did not have expertise in cryptocurrency or blockchain technology. I was presented documents and video by OneCoin, showing OneCoin to be a tremendous financial opportunity in the cryptocurrency world.
- 3. One of the main proponents of OneCoin that was shown to me was Chris Principe. His Financial IT Magazine, featuring Ruja Ignatova, was presented to show the alleged legitimacy of OneCoin. OneCoin also presented me videos of Mr. Principe advocating for OneCoin, including videos of him endorsing OneCoin at events in front of thousands and thousands of OneCoin members and potential investors. He was presented by OneCoin to be a person with credible and valuable advice in the financial industry, so I believed him when he advised that OneCoin

was a great investment opportunity. These representations by Mr. Principe helped to lure me into investing into OneCoin.

- 4. OneCoin promised us astronomical high financial returns based on an investment into a genuine cryptocurrency, a return that would change our financial lives forever. We were also told we would be able to withdraw our investment money that we gave to OneCoin after a few months if we wanted.
- 5. After a while I became suspicious of about OneCoin. I received a call from a friend who had invested 9,000 Euros on OneCoin, who expressed his concerns that OneCoin was a pyramid Ponzi scheme and was not a genuine cryptocurrency. To create a genuine cryptocurrency blockchain technology is required, and OneCoin did not have such technology.
- 6. Additionally, OneCoin began switching banks they would use, from one bank in one country, to another bank in another country. I realized that OneCoin members that would question these actions, and others, would be ostracized, being removed from OneCoin's interactive What's App application. Members of the OneCoin group relied on What's App to receive information about what was happening with OneCoin, so people feared being removed from it.
- 7. I have asked for the money I invested in OneCoin to be returned.

 However, it has not been returned. I, and many others I know, have not been able to withdraw our investment, and our requests to have our money returned have been ignored or denied by OneCoin. We were fraudulently sold a false financial

dream that we believed to be true, and our money was taken from us.

8. I have gone to law enforcement regarding the money that was taken for me. Hopefully I can get my money back. It is hard awakening to the reality

that I, and many, many others, invested our savings in OneCoin, which I feel is just

a multi-billion dollar Ponzi scheme.

9. In April 2017, I created a support group for others like myself had money fraudulently taken from us by OneCoin.

10. Tim Curry has been invaluable helping with the support group, by helping me post factual information about OneCoin, and updating us regarding other foreign authorities' investigations into OneCoin. He gives us hope and faith that there are still good people out there in this world who do really care for innocent people who are losing their money and life savings, or entering into lifelong debt, in a Ponzi scheme such as OneCoin. Tim continues

- 11. It is my personal opinion that Chris Principe is responsible for helping to spread OneCoin's fraudulent schemes by promoting OneCoin in his magazine, by appearing at live events endorsing OneCoin, and by allowing the use of videos by OneCoin featuring him, in which he endorses investment into OneCoin.
- 12. I believe that the number of OneCoin victims is estimated to be over three million.

Case 8:17-cv-00608-JLS-KES Document 34 Filed 11/13/17 Page 5 of 5 Page ID #:248 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed in William Scotland, United Kingdom, on November 10, 2017